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April 12, 2007

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., SW
Washington, DC 20554

Re: Frontline's Support for the Balanced Consensus Plan
WT Docket Nos. 96-86, 06-150

Dear Ms. Dortch:

Furthering competition in the broadband wireless marketplace is an important principle of the Public Safety Broadband Deployment Plan proposed by Frontline Wireless, Inc. ("Frontline"). Frontline's proposal for an upper 700 MHz "E" Block, featuring a uniquely open nationwide license, would further the competitive power of small and rural wireless carriers by providing a much-needed roaming solution while ensuring the privately-funded buildout of a nationwide, public safety network for interoperability.

Consistent with such competitive principles, Frontline writes in support of creating small license areas in the upper 700 MHz C and D Blocks, based on either Cellular Market Areas ("CMAs") or Economic Areas ("EAs"). Establishing a mix of licenses of varying sizes and geographic regions in the C and D Blocks, while creating a nationwide license in the "E" Block for the shared public safety/commercial network, will provide vital roaming solutions for small carriers, facilitate competitive access to critical broadband spectrum and further the public's interest in a competitive and robust wireless marketplace.

This position is generally consistent with both the Balanced Consensus Plan, as proposed in the above-referenced proceedings by a broad cross-section of small, mid-sized, regional and rural carrier interests,¹ and the SpectrumCo LLC Proposed Band Plan.²

¹ See *Balanced Consensus Proposal for Reconfiguring the 700 MHz Band Plans*, WT Docket No. 06-150 (filed Oct. 20, 2006).

² See *Spectrum Co LLC Ex Parte Communication*, WT Docket No. 06-150 (filed Jan. 8, 2007).

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Frontline looks forward to continuing to work with the Commission as it adopts final service rules for a timely and competitive auction of 700 MHz spectrum.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew S. DelNero". The signature is fluid and cursive, with a long horizontal stroke at the end.

Matthew S. DelNero
*Counsel to Frontline
Wireless, LLC*